

# EXHIBIT 9

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**SCIENTIFIC GAMES' STATEMENT OF INTENDED PROOFS**

1. Scientific Games intends to prove that it has not infringed claims 20 or 21 of the '337 patent or claim 18 of the '624 patent by making, using, offering for sale or selling its PlayCentral Kiosk.

2. Scientific Games intends to prove that claims 20 and 21 of the '337 patent and claim 18 of the '624 patent are invalid, either for anticipation under 35 U.S.C. § 102 or obviousness under 35 U.S.C. § 103.

3. Scientific Games intends to prove that claim 18 of the '624 patent is invalid for indefiniteness under 35 U.S.C. § 112, ¶ 2, if the structure corresponding to the "means for dispensing" element is not construed to include the feeding and bursting mechanism disclosed in the '337 patent and incorporated by reference into the '624 patent.

4. Scientific Games intends to prove that any infringement of the '337 patent or the '624 patent has not been willful.

5. Scientific Games intends to prove that, if the '337 patent or '624 patent is valid and infringed, GTECH is not entitled to recover lost profits damages. Scientific Games intends to prove that GTECH is entitled to recover no more than a reasonable royalty that is limited by the non-infringing alternatives that were available to Scientific Games at the time of the hypothetical negotiation in 2003.

6. Scientific Games intends to prove that GTECH's damages claim should be limited under 35 U.S.C. § 287(a) as a result of GTECH's failure to mark its products sold in the United States with the numbers of the patents in suit.